

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH :
OF A GROUND ADVANTAGE PARCEL : 1:24MJ93-1
IN GREENSBORO, NC :

MOTION TO SEAL

NOW COMES the United States of America, by Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, through her assistant, Lindsey A. Freeman, and respectfully moves this Honorable Court to seal the Application for a Search Warrant, the Search and Seizure Warrant, the Affidavit in Support of Application, and Supplement to this Motion. Such sealing is within the inherent power of the Court to control papers filed with it. *See, e.g., Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989). In support whereof, the Government shows unto the Court the following:

(1) The search warrant relates to an investigation into a criminal conspiracy. The target and co-conspirators continue to operate and the investigation into their unlawful conduct is ongoing. Additional searches may occur as the investigation continues.

(2) Premature disclosure of the contents of the search warrant and the supplement to this motion may warn targets of this investigation, leading to potential destruction of evidence and/or witness tampering.

(3) Therefore, premature disclosure of the contents of the search warrant may have a significant negative impact on the effectiveness of the continuing investigation.

WHEREFORE, the Government respectfully moves that this Honorable Court seal the Application for a Search Warrant, the Search and Seizure Warrant, the Affidavit in Support of Application, and Supplement to this Motion, as well as alter the caption for sealing purposes, until further order of the Court.

This the 25th day of March, 2024.

Respectfully submitted,

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